FILE 2756 – March 6, 2020

PUBLIC OFFICERS; FINANCIAL DISCLOSURE

MAYOR EMERITUS OF THE CITY OF CAPE CANAVERAL

To: Anthony A. Garganese, Esq. (Cape Canaveral)

SUMMARY:

Under the circumstances presented, the Mayor Emeritus of the City of Cape Canaveral is a "public officer" subject to the requirements of Section 112.313, Florida Statutes, but is not a "local officer" required to file a statement of financial interests under Section 112.3145, Florida Statutes.

QUESTION 1:

Is the Mayor Emeritus of the City of Cape Canaveral a "public officer" subject to the standards of conduct contained within Section 112.313, Florida Statutes?

Under the particular circumstances presented, this question is answered in the affirmative.

According to your inquiry, former Mayor of the City of Cape Canaveral, Rocky Randels, completed his most recent term of as a member of the City Council in November 2019, after 31 years of serving the City in elective office. In recognition of his public service record, the City passed a resolution to offer Mr. Randels the title and position of Mayor Emeritus of the City of Cape Canaveral (Mayor Emeritus). According to the resolution, the position of Mayor Emeritus is an unpaid, volunteer position without benefits, except as provided below, and with certain

1 You inform us that Mr. Randels is eligible under law to receive a pension from the City due to his length of service. Mr. Randels invoked this benefit during his last term of office and waived the payments for the remainder of his term. You state that he is eligible to receive pension
duties and privileges, including: (1) serving as an advocate and good will ambassador for the City, (2) having access to the City email and Office 365 Cloud, (3) having access to City Hall with a new ID badge and business cards, (4) having access to the council's workroom and a computer, and, subject to proper appropriations and approvals, (5) receiving direct payment or reimbursement by the City of expenses related to the official approved duties of the position, such as approved memberships, events, meetings, meals, mileage, and lodging. The resolution specifies that the Mayor Emeritus is not a member of the City Council or any City boards and does not have authority to bind the City to any decision or contract. Lastly, the resolution states that the position shall automatically terminate if Mr. Randels announces his candidacy or qualifies to run for any elective office.

In addition to what is stated in the resolution, you inform us that the Mayor Emeritus will serve as the City's alternate voting member on the Space Coast League of Cities, an organization of regional municipalities promoting their mutual interests. You also inform us that the City's insurance carrier will extend workers' compensation insurance to Mr. Randels as an incident of his volunteer status with the City.

Section 112.313(1), Florida Statutes, defines "public officer" as "any person elected or appointed to hold office in any agency, including any person serving on an advisory body." An "agency" is defined in Section 112.312(2), Florida Statutes, as:

"any state, regional, county, local, or municipal government entity of this state, whether executive, judicial, or legislative; any department, division, bureau, commission, authority, or political subdivision of this state therein; any public school, community college, or state university; or any special district as defined in s. 189.012."

payments going forward and those pension payments would not constitute payment for his performance as Mayor Emeritus.
We find that any holder of the Mayor Emeritus position, as outlined in the City's resolution, is a "public officer" as that term is defined by Section 112.312(2). The City is an "agency" inasmuch as it is a political subdivision of the State. The position is an "office" inasmuch as it has been delegated the authority by a mechanism of law to publicly represent the City on certain matters as a goodwill ambassador and to advocate for the interests of the City and the authority to exercise these duties is assumed only through appointment by the City Council.

For the foregoing reasons, we find the Mayor Emeritus is a public officer for purposes of Section 112.313.

Your first question is answered accordingly.

**QUESTION 2:**

Is the Mayor Emeritus a "local officer" required to file statements of financial interests under Section 112.3145, Florida Statutes?

Under the particular circumstances presented, your question is answered in the negative.

Section 112.3145, Florida Statutes, requires "local officers," "state officers," and "specified state employees" to a statement of financial interests annually no later than July 1 each year, within 30 days of assuming public office or employment, and within 60 days of leaving their public position. There is no indication that Mr. Randels is a state officer or specified state employee by way of other employment or officeholding, so we need only concern ourselves with the question of whether he is a local officer.

Section 112.3145(1)(a), Florida Statutes defines a "local officer" as:

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2 Section 1.01(8), Florida Statutes, defines “political subdivision,” for purposes of interpreting the Florida Statutes, to include “counties, cities, towns, villages, special tax school districts, special road and bridge districts, bridge districts, and all other districts in this state.”
1. Every person who is elected to office in any political subdivision of the state, and every person who is appointed to fill a vacancy for an unexpired term in such an elective office.

2. Any appointed member of any of the following boards, councils, commissions, authorities, or other bodies of any county, municipality, school district, independent special district, or other political subdivision of the state:
   a. The governing body of the political subdivision, if appointed;
   b. A community college or junior college district board of trustees;
   c. A board having the power to enforce local code provisions;
   d. A planning or zoning board, board of adjustment, board of appeals, community redevelopment agency board, or other board having the power to recommend, create, or modify land planning or zoning within the political subdivision, except for citizen advisory committees, technical coordinating committees, and such other groups who only have the power to make recommendations to planning or zoning boards;
   e. A pension board or retirement board having the power to invest pension or retirement funds or the power to make a binding determination of one’s entitlement to or amount of a pension or other retirement benefit; or
   f. Any other appointed member of a local government board who is required to file a statement of financial interests by the appointing authority or the enabling legislation, ordinance, or resolution creating the board.

3. Any person holding one or more of the following positions: mayor; county or city manager; chief administrative employee of a county, municipality, or other political subdivision; county or municipal attorney; finance director of a county, municipality, or other political subdivision; chief county or municipal building code inspector; county or municipal water resources coordinator; county or municipal pollution control director; county or municipal environmental control director; county or municipal administrator, with power to grant or deny a land development permit; chief of police; fire chief; municipal clerk; district school superintendent; community college president; district medical examiner; or purchasing agent having the authority to make any purchase exceeding the threshold amount provided for in s. 287.017 for CATEGORY TWO, on behalf of any political subdivision of the state or any entity thereof.

Because the position of Mayor Emeritus is not an elective office or a member of one of the specified appointive boards, the position will not meet the specifications of Sections 112.3145(1)(a)1. and 2., Florida Statutes. The Mayor Emeritus position does not coincide with the positions listed in Section 112.3145(1)(a)3., Florida Statutes. Among the positions listed is "mayor," but the Mayor Emeritus is not a mayor and does not have any duties typically reserved for a mayor. Also, we assume from the context of the duties of the Mayor Emeritus that the
holder of the position will have spending authority below the threshold amount provided in Section 287.017 for Category Two.\(^3\) In sum, we find that the Mayor Emeritus is not a "local officer" and, therefore, is not required by Section 112.3145 to file a statement of financial interests.

Your second question is answered accordingly.

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Kimberly B. Rezanka, Chair

KBR/sjz/dw

cc: Anthony A. Garganese, Esq.

\(^3\) That amount presently is set at $35,000.
December 26, 2019

Chris Anderson, Executive Director
The Florida Commission on Ethics
P. O. Drawer 15709
Tallahassee, FL 32317-5709

Re: City of Cape Canaveral – Request for Advisory Opinion for Mayor Emeritus Rocky Randels – Form 1 Filing Requirements and Application of the Code of Ethics

Dear Mr. Anderson:

The undersigned is the City Attorney of the City of Cape Canaveral ("City"). I have been asked by the City and Mayor Emeritus Rocky Randels ("Randels") to request an advisory opinion regarding whether Randels is required to continue filing an annual Form 1 financial disclosure pursuant to Section 112.3145, Florida Statutes, and the general application of the Code of Ethics.

BACKGROUND

Randels is a former long standing, highly-regarded elected mayor and city council member of the City. He served as a City elected official for 31 years, and his most recent term as a councilmember came to an end this past November. Due to Randels' extraordinary service to the City, on December 17, 2019, the City Council adopted Resolution No. 2019-25 ("Resolution") bestowing upon Randels the honorary title of "Mayor Emeritus of the City of Cape Canaveral." The title is intended to be perpetual, but may be terminated under certain circumstances.

The Resolution establishes duties, privileges, and conditions of the Mayor Emeritus position. In general, the Mayor Emeritus position is an unpaid, volunteer position, and the Mayor Emeritus serves as a good will ambassador and advocate for the City. The Mayor Emeritus does not receive employee benefits such as health and life insurance and is not subject to any required or specific work schedule. Additionally, the Mayor Emeritus has no authority to bind the City. In addition, although not expressed in the Resolution, the City Council has also appointed the Mayor Emeritus to serve as the City's alternate voting member on the Space Coast League of Cities, which is an organization consisting of Brevard County municipalities collaboratively working to promote local self-government and
the needs of Brevard County municipalities and residents. The Space Coast League of Cities also works closely with the Florida League of Cities. See www.sloc.org. Further, as a City volunteer appointed by the City Council, the City’s insurance carrier has advised the City that workers compensation coverage will be afforded Randels. See § 440.02(15)(d)6, Fla. Stat. (definition of “employee” under workers compensation statute does not include a “volunteer, except a volunteer worker for the state or a county, municipality, or other governmental entity”). Lastly, the Resolution does not explicitly require the Mayor Emeritus to file a Form 1 financial disclosure. A copy of the Resolution is attached for your consideration.

Although the Mayor Emeritus position is an unpaid position, without benefits, Randels may receive an annual municipal pension because in November 2016, Randels previously invoked a statutory municipal pension under Section 112.048, Florida Statutes based on 20 or more years of consecutive elected service (1987 to 2015). The pension was invoked by Randels just prior to commencing his last elected term in office (2016 to 2019). As set forth in Section 112.048, the pension is equivalent to one-half of the full amount of the annual or monthly salary that the City was paying him when he retired ($3,200.00/2 = $1,600.00 per year). Prior to commencing his last term in office, however, Randals waived payment of his municipal pension for the duration of his entire term. But now that he is no longer an elected member of the City Council, Randals is considering whether or not to continue waiving the municipal pension. If paid, the municipal pension would not be paid for purposes of compensating him for his volunteer services as Mayor Emeritus.

**ISSUES PRESENTED**

A. Whether Mayor Emeritus Rocky Randals is a “local officer” required to file a Form 1 Financial Disclosure under Section 112.3145, Florida Statutes, if he either does or does not receive a municipal pension from the City pursuant to Section 112.048, Florida Statutes?

B. Whether Mayor Emeritus Rocky Randals is a “public officer” under Section 112.313(1), Florida Statutes and/or “employee” of the City of Cape Canaveral subject to Part III, Chapter 112, Florida Statutes (Code of Ethics for Public Officers and Employees)?

**LEGAL ANALYSIS**

A. **Form 1 Financial Disclosure**

Section 112.3145, Florida Statutes requires a local officer to annually file a statement of financial interest. The term “local officer” is defined as follows:

1. Every person who is elected to office in any political subdivision of the state, and every person who is appointed to fill a vacancy for an unexpired term in such an elective office.
2. Any appointed member of any of the following boards, councils, commissions, authorities, or other bodies of any county, municipality, school district, independent special district, or other political subdivision of the state:
   a. The governing body of the political subdivision, if appointed;
   b. A community college or junior college district board of trustees;
   c. A board having the power to enforce local code provisions;
   d. A planning or zoning board, board of adjustment, board of appeals, community redevelopment agency board, or other board having the power to recommend, create, or modify land planning or zoning within the political subdivision, except for citizen advisory committees, technical coordinating committees, and such other groups who only have the power to make recommendations to planning or zoning boards;
   e. A pension board or retirement board having the power to invest pension or retirement funds or the power to make a binding determination of one's entitlement to or amount of a pension or other retirement benefit; or
   f. Any other appointed member of a local government board who is required to file a statement of financial interests by the appointing authority or the enabling legislation, ordinance, or resolution creating the board.

3. Any person holding one or more of the following positions: mayor; county or city manager; chief administrative employee of a county, municipality, or other political subdivision; county or municipal attorney; finance director of a county, municipality, or other political subdivision; chief county or municipal building code inspector; county or municipal water resources coordinator; county or municipal pollution control director; county or municipal environmental control director; county or municipal administrator, with power to grant or deny a land development permit; chief of police; fire chief; municipal clerk; district school superintendent; community college president; district medical examiner; or purchasing agent having the authority to make any purchase exceeding the threshold amount provided for in s. 287.017 for CATEGORY TWO, on behalf of any political subdivision of the state or any entity thereof.

§ 112.3145(1)(a), Fla. Stat.

The definition of “local officer” includes a list of municipal officer positions including a “mayor.” § 112.3145(1)(a)3., Fla. Stat. However, Section 112.3145(1)(a)3. does not distinguish between an elected mayor currently serving on a city council and an honorary mayor serving as a volunteer “mayor emeritus” appointed by a city council. I could not find any ethics opinions addressing whether a former elected official serving in a volunteer capacity as mayor or councilmember emeritus, with no authority to bind the city under which he or she serves, constitutes a local officer. There are, however, several ethics opinions which have concluded that a person serving in a position that ordinarily would be considered a local officer, like a fire chief, is not considered a local officer if that person is serving in that position as an unpaid volunteer. CEO 81.55. The reasoning in CEO 81.55 was that the “fire chief” position was intended to include public officers or employees who have substantial governmental responsibilities in the administration of the public agency.
The opinion noted, however, that the fire chief was not appointed to that position by a
government authority. See also CEO 81-55 (chief of a volunteer fire department elected
solely by the volunteers is not required to file a Form 1); CEO 94-46 (private attorneys
volunteering to serve as uncompensated assistant state attorneys are not required to file
Form 1). Similarly, in CEO 76-84, the Commission opined that a chief of a privately
operated volunteer fire department, who was named by the department and receives no
compensation, public or otherwise, was not subject to the Code of Ethics because “[w]hile
the statute is intentionally broad in nature, it is not applicable to private citizens who hold
no public appointment or employment. The subject fire chief serves in that capacity at the
pleasure of the volunteer fire department; he holds no appointment by a public official or
body.”

In this case, “mayor emeritus” is an honorary title given to Randels by the City
Council of the City of Cape Canaveral in perpetuity. It is an unpaid, volunteer position with
the City in which Randels will serve as a good will ambassador and advocate for the City.
Randels will not perform any legal duties or functions required of the City’s duly elected
mayor pursuant to Article II of the City of Cape Canaveral Charter and law. The position
has not been given any binding authority for the City and does not require that Randels
serve on any City board. Randels will receive no compensation or City employment
benefits. Randels may, however, serve as an alternate voting member for the City on the
Space Coast League of Cities.

Based on the statutory definition of “local officer,” and what little legal authority I
could find interpreting it, the Mayor Emeritus position, as defined in the Resolution, seems
somewhat similar to the volunteer fire chief and assistant state attorney positions
referenced in the aforementioned Florida Commission on Ethics opinions, with the
exception that the Mayor Emeritus does not actually serve in the underlying position of
mayor. Therefore, it is my opinion that the Mayor Emeritus position will likely not be
considered a local officer requiring the filing of a Form 1 financial disclosure.

B. Code of Ethics for Public Officers and Employees.

Public officers and employees of an agency are generally subject to Part III, Chapter
112, Florida Statutes, regarding the code of ethics for public officers and employees
(“Code of Ethics”). Section 112.313(1), Florida Statutes defines the term “public officer” to
mean “any person elected or appointed to hold office in any agency, including any person
serving on an advisory body.” On the other hand, the term “employee” of an agency is not
statutorily defined.

Regarding the issue of whether a volunteer should be considered an employee of an
agency for purposes of the Code of Ethics, the Commission has issued several relevant
opinions. In CEO 86-45, the Commission opined that an auxiliary deputy sheriff that: (i)
served without compensation or other employment benefits; (ii) was not covered by
worker’s compensation while on duty; and (iii) did not have the power of arrest, was nether
a public officer or employee and therefore, was not governed by the Code of Ethics. But,
in that opinion, the Commission seemed to qualify its opinion based on whether the person
Mr. Anderson  
12/26/2019  
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has workers compensation coverage when it stated that "[i]n CEO 83-80 we indicated that we might consider a certified reserve deputy who was covered by workers' compensation while on duty to be an employee of the sheriff's department, even though his service was as a nonpaid volunteer."

Likewise, the Commission opined that a volunteer Highway Patrol Auxiliary is not an employee subject to the Code of Ethics. See CEO 88-30. In CEO 88-30, the Commission noted that the Court in Wright v. State Commission on Ethics, 389 S. 2d 662, 663 (Fla. 1st DCA 1980) used the following definition of "employee" in interpreting Section 112.313(10), Florida Statutes:

An employee is one who for consideration agrees to work subject to the orders and direction of another, usually for regular wages but not necessarily so, and further agrees to subject himself at all times during the period of service to the lawful orders and directions of the other in respect to the work to be done.

Additionally, in CEO 80-90, the Commission opined that a person who volunteers service to a city as a part-time city engineer without compensation and without employee benefits was not an employee for purposes of construing the conflict of interest provision of the Code of Ethics.

Here, the Mayor Emeritus position is appointed and governed by Resolution approved by the City Council, and is done in a manner similar to other appointments made by the City Council including those to advisory boards. As such, the appointed Mayor Emeritus position seems to fall within the definition of "local officer," as set forth in Section 112.313(1), Florida Statutes. Furthermore, although the Mayor Emeritus position has similar characteristics (e.g., volunteer services, without compensation and without benefits), as the auxiliary and engineer positions determined not to be an employee by the Commission, as noted above, the Mayor Emeritus position does fall within the definition of "employee" under the workers' compensation statute and is afforded workers compensation coverage by the City. See § 440.02(15)(d)6, Fla. Stat.; See also, Parker v. State Department of Health and Rehabilitative Services, 649 So. 2d 361 (Fla. 1st DCA 1995) (volunteer services for governmental entity are within the statutory definition of employee under workers' compensation statute).

Therefore, it seems to me that the Mayor Emeritus position, as created and defined by Resolution No. 2019-25, likely constitutes both a "public officer" and an employee for purposes of applying the Code of Ethics.

Given the unique nature of the Mayor Emeritus position established by Resolution No. 2019-25, I was unable to find any ethics opinions substantially on-point regarding the two issues presented above. Thus, absent the existence of such opinions to more fully guide the Mayor Emeritus, the Mayor Emeritus and the City seek guidance from the Commission regarding Randels' filing requirements under Section 112.3145, Florida Statutes, and the general application of the Code of Ethics. Therefore, on behalf of Mayor
Emeritus Rocky Randels and the City of Cape Canaveral, I respectfully request a written advisory opinion on the issues expressed above.

We look forward to receiving a response to the two issues presented. If you have any questions regarding this request, please do not hesitate to contact me.

Sincerely,

Anthony A. Garganese
City Attorney of Cape Canaveral

Cc: Todd Morley, Interim City Manager
Mia Goforth, City Clerk
Rocky Randels (via City Clerk)
RESOLUTION NO. 2019-25

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CAPE CANAVERAL, BREVARD COUNTY, FLORIDA; BESTOWING UPON ROCKY RANDELS THE OFFICIAL HONORARY TITLE OF “MAYOR EMERITUS OF THE CITY OF CAPE CANAVERAL” AND ESTABLISHING THE DUTIES, PRIVILEGES AND CONDITIONS OF THIS VOLUNTEER, UNPAID POSITION; PROVIDING FOR THE REPEAL OF PRIOR INCONSISTENT RESOLUTIONS, TERMINATION PROVISIONS, SEVERABILITY AND AN EFFECTIVE DATE.

WHEREAS, Rocky Randels has been a resident of the City of Cape Canaveral for almost forty years; and

WHEREAS, during this time period, Rocky Randels has served the City of Cape Canaveral as an appointed member of the City’s Planning and Zoning Board and an elected member of the City Council as either Council Member or Mayor for 31 years including 28 consecutive years from 1987 to 2015; and

WHEREAS, Rocky Randels has tirelessly and diligently served the City of Cape Canaveral community by advocating the City’s interests at Federal, State and County levels including before many Boards of Directors, Committees and Associations of both governmental and private organizations; and

WHEREAS, Rocky Randels has also championed the interests of the City of Cape Canaveral and all municipalities for decades across the State of Florida through the Florida League of Cities and Space Coast League of Cities; and

WHEREAS, throughout his tenure on the City Council, including as the City’s Mayor, Rocky Randels earned the respect and admiration from his colleagues, businesses, local charities and citizens for his dedicated and unwavering commitment to improve the quality of life for all citizens of the City of Cape Canaveral and municipalities throughout the State of Florida; and

WHEREAS, the City Council desires to honor Rocky Randels’ distinguished service to the City of Cape Canaveral by conferring upon him the honorary title of “Mayor Emeritus of the City of Cape Canaveral, Florida;” and

WHEREAS, the City Council finds that this Resolution serves a municipal purpose and is in the best interests of the City of Cape Canaveral and its citizens, businesses, institutions and community and charitable organizations; and

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Cape Canaveral, Florida:

Section 1. Recitals. The foregoing recitals contained in the preamble to this Resolution are incorporated by reference herein.
Section 2. Mayor Emeritus. The City Council hereby bestows the official honorary title of “Mayor Emeritus” on former Mayor Rocky Randels. It shall be the duty of the Mayor Emeritus to serve as an Advocate and “good will” Ambassador for the City of Cape Canaveral, in perpetuity unless terminated by either party in accordance with Section 4 of this Resolution. However, should Rocky Randels announce candidacy and/or qualify to run for any elected office, the title and duties shall automatically terminate upon his announcement and/or qualifying for elected office.

Section 3. Duties and Privileges; Conditions. The following duties and privileges and conditions are approved by the City Council:

A. Duties and Privileges. Mayor Emeritus shall be considered a volunteer and unpaid City position. Subject to City rules and policies, the duties and privileges of Mayor Emeritus shall include:

a. Advocate and “good will” Ambassador for the City of Cape Canaveral
b. Access to City email/Office 365 Cloud
c. Access to City Hall with a new ID Badge and City business cards
d. Access to Council Workroom/Computer
e. Upon prior approval by the City Manager or City Council, and subject to budget appropriations by the City Council, direct payment or reimbursement by the City of expenses related to the official approved duties of Mayor Emeritus such as approved memberships, events, meetings, meals, mileage and lodging.

B. Good Will Role. As a “good will” Ambassador of the City, the Mayor Emeritus agrees not to make any oral or written communication to any person or entity which disparages, or has the effect of damaging the reputation of, or otherwise working in any way to the detriment of the City.

C. No Binding Authority. However, neither this Section nor any other provision of this Resolution be shall interpreted or construed as granting to Mayor Emeritus any authority whatsoever to bind or commit the City to any matter or decision by verbal or written contract or by any other means.

D. Sunshine Law Guidance. The Mayor Emeritus position shall not be considered, interpreted or construed as being a member of the City Council or any other City board or committee. Thus, for Sunshine Law purposes, the Mayor Emeritus can freely communicate his view of City related issues not only at public meetings of the City Council, or other City board or committee, but he can also freely communicate his view outside of a public meeting with members of the City Council and other City board and committee members, provided the Mayor Emeritus shall not serve as a conduit to communicate between councilmembers and City board and committee members regarding their respective issues that foreseeably will be considered by the Council, board or committee at a future meeting.

E. Public Records Guidance. All public records made or received by the Mayor Emeritus, as the term “public record” is defined by Florida law, in connection with official City business and this Resolution shall be maintained by the Mayor Emeritus and delivered to the City Clerk for archiving and disposition pursuant to Florida law.
Section 4. Repeal of Prior Inconsistent Resolutions; Termination. All resolutions or parts of resolutions in conflict herewith are hereby repealed to the extent of the conflict. The City Council may terminate the “Mayor Emeritus” designation at any time, without notice or penalty, by repealing this Resolution. Rocky Randels may terminate his acceptance of the official honorary title of “Mayor Emeritus” and the duties and privileges afforded by this Resolution at any time by providing written notice of termination to the City Manager or Mayor or as otherwise provided in Section 2 regarding candidacy for office.

Section 5. Severability. If any section, subsection, sentence, clause, phrase, word or portion of this Resolution is for any reason held invalid or unconstitutional by any court of competent jurisdiction, such portion shall be deemed a separate, distinct and independent provision and such holding shall not affect the validity of the remaining portion hereto.

Section 6. Effective Date. This Resolution shall become effective immediately upon adoption by the City Council of the City of Cape Canaveral, Florida, and acceptance by Rocky Randels by execution of this Resolution.

[Adoption and Signature Page Follows]
ADOPTED in a Regular Meeting of the City Council of the City of Cape Canaveral, Florida, this 17th day of December 2019.

Bob Hoog, Mayor

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Approved as to legal form and sufficiency for the City of Cape Canaveral only by:

Anthony A. Garganese, City Attorney

I hereby accept the title "Mayor Emeritus of the City of Cape Canaveral, Florida" and agree to abide by the terms and conditions of this Resolution:

Rocky Randels, Mayor Emeritus

Date: December 17, 2019
Anthony,  
Thank you.  
Chris Anderson  
C. Christopher Anderson, III  
Executive Director and General Counsel  
Florida Commission on Ethics  
(850) 488-7864

From: Anthony A. Garganese <agarganese@orlandolaw.net>  
Sent: Monday, December 30, 2019 7:06 PM  
To: Anderson, Chris <ANDERSON.CHRI@leg.state.fl.us>  
Subject: City of Cape Canaveral - Request for Advisory Opinion  
Importance: High

Hello Chris,  

Happy New Year!  

Last week my office sent a letter addressed to you requesting an advisory opinion for the City of Cape Canaveral. Unfortunately, I do not believe a copy of the City Resolution referenced in my letter was included in the envelope. Just in case it wasn’t, I am forwarding the Resolution and another copy of the letter via email. Please let me know if you have any questions or need any additional information.

Thank you and your staff in advance for your consideration into the issues presented in my letter.

Regards,  

Anthony

Garganese, Weiss, D’Agresta & Salzman, P.A.  
Anthony A. Garganese, Shareholder  
Board Certified in City, County & Local Government Law  
111 N. Orange Ave., Suite 2000  
P.O. Box 2873  
Orlando, Florida 32802-2873
Any incoming e-mail reply to this communication will be electronically filtered for "spam" and/or "viruses." That filtering process may result in such reply being quarantined (i.e., potentially not received at our site at all) and/or delayed in reaching us. For that reason, we may not receive your reply and/or we may not receive it in a timely manner. Accordingly, you should consider sending communications to us which are particularly important or time-sensitive by means other than e-mail.

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